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12 Media.Net Advertising FZ-LLC

13
14 **UNITED STATES DISTRICT COURT**
NORTHERN DISTRICT OF CALIFORNIA

15 MEDIA.NET ADVERTISING FZ-LLC,
16

17 Plaintiff,

18 v.

19
20 NETSEER, INC. and DOES 1-10,

21 Defendants.
22

No. 3:14-cv-03883-EMC

**STIPULATION AND [PROPOSED]
ORDER TO CONTINUE HEARING
DATE FOR MOTION OF
DEFENDANT NETSEER TO
DISMISS SECOND AMENDED
COMPLAINT (12(b)(6)) OR, IN THE
ALTERNATIVE, MOTION TO
STRIKE (RULE 12(f))**

The Honorable Edward M. Chen

Current Hearing Date: June 30, 2016

Proposed Hearing Date: July 7, 2016

Courtroom: 5, 17th Floor

1 Plaintiff Media.net Advertising FZ-LLC and Defendant NetSeer, Inc. (the
2 “Parties”) through their respective counsel, hereby stipulate and agree as follows:

3 WHEREAS, the hearing on NetSeer’s motion to dismiss second amended
4 complaint (Rule 12(b)(6)) or, in the alternative, motion to strike (Rule 12(f)) (Dkt. 84) is
5 presently scheduled for June 30, 2016;

6 WHEREAS, counsel for Media.net will be out of the country from June 16, 2016
7 through June 30, 2016. (Declaration of Leeor Neta, dated May 24, 2016 (“Neta Decl. ”),
8 ¶ 2);

9 WHEREAS, counsel for NetSeer is agreeable to a one-week continuance of the June
10 30, 2016 hearing (Neta Decl., ¶ 3);

11 WHEREAS, there have been no previous time modifications with respect to the
12 motion to dismiss second amended complaint hearing (Neta Decl., ¶ 4);

13 WHEREAS, the requested time modification will have no effect on the schedule for
14 the case (Neta Decl., ¶ 5);

15 WHEREAS, there is good cause for the requested continuance, no prejudice will
16 result therefrom, and the parties seeking a continuance have acted diligently (Neta Decl.,
17 ¶ 6).

18 NOW THEREFORE, the parties stipulate and request an order as follows:

19 1. The hearing on NetSeer’s motion to dismiss second amended complaint
20 (Dkt. 84) should be continued to July 7, 2016 (~~or _____ [the earliest date~~
21 ~~thereafter]~~) at 10:00 a.m.; and

22 2. The briefing schedule on NetSeer’s motion to dismiss second amended
23 complaint (Dkt. 84) will remain unaffected.

1 DATED this 24th day of May 2015.

2
3 **NEWMAN DU WORS LLP**

4 By: /s/ Leeor Neta
5 Leeor Neta, State Bar No. 233454
6 leeor@newmanlaw.com

7 Attorney for Plaintiff
8 Media.Net Advertising FZ-LLC

9 DATED this 24th day of May 2015.

10
11 **PILLSBURY WINTHROP LLP**

12 By: /s/ Vernon Granneman
13 Vernon Granneman, State Bar No. 83532
14 vernon.granneman@pillsburylaw.com

15 Attorney for Defendant
16 Netseer, Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: May 26, 2016

The Honorable
United States

